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Attorney for the United States of America,

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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 TANYE JOHNSON,

13 Defendant.

Case No. 2:18-cr-00353-APG-NJK

STIPULATION TO MODIFY PRETRIAL
RELEASE CONDITIONS

14 IT IS HEREBY STIPULATED AND AGREED, by and between CHRISTOPHER
15 CHIOU, Acting United States Attorney, and CHRISTOPHER BURTON, Assistant United
16 States Attorney, counsel for the United States of America, and TODD LEVENTHAL, ESQ.,
17 counsel for Defendant TANYE JOHNSON, that the current conditions of pretrial release
18 should be modified as follows:

19 1. The defendant shall participate in mental health treatment as directed by Pretrial
20 Services or the supervising officer.

21 2. The defendant shall pay all or part of the cost of the medical or psychiatric
22 treatment program or evaluation based upon her ability to pay as determined by Pretrial
23 Services or the supervising officer.

3. The defendant shall satisfy all outstanding warrants within a timeframe determined by Pretrial Services and provide verification to Pretrial Services or the supervising officer.

This stipulation is entered into for the following reasons:

1. The defendant has entered a pretrial diversion agreement with the government and is currently under its terms. ECF No. 46.

2. The parties believe the proposed additional conditions are appropriate based on the defendant's history and characteristics and are intended to assist her in complying with the conditions of her pretrial diversion agreement.

3. This is the first stipulation to modify conditions filed herein.

DATED this 23rd day of July, 2021.

Respectfully submitted,
CHRISTOPHER CHIOU
Acting United States Attorney

//s// Todd Leventhal
TODD LEVENTHAL, ESQ.
Counsel for Defendant
TANYE JOHNSON

//s// Christopher Burton
CHRISTOPHER BURTON
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TANYE JOHNSON,

Defendant.

Case No. 2:18-cr-00353-APG-NJK

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The defendant has entered a pretrial diversion agreement with the government and is currently under its terms. ECF No. 46.
2. The parties believe the proposed additional conditions are appropriate based on the defendant's history and characteristics and are intended to assist her in complying with the conditions of her pretrial diversion agreement.
3. This is the first stipulation to modify conditions filed herein.

CONCLUSIONS OF LAW

The Court may modify conditions of pretrial release under Title 18, United States Code, Section 3142(c)(3). The Court hereby finds there is good cause to modify the defendant's pretrial release conditions as follows:

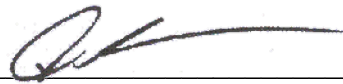
1. The defendant shall participate in mental health treatment as directed by Pretrial Services or the supervising officer.

1 2. The defendant shall pay all or part of the cost of the medical or psychiatric
2 treatment program or evaluation based upon her ability to pay as determined by Pretrial
3 Services or the supervising officer.

4 3. The defendant shall satisfy all outstanding warrants within a timeframe
5 determined by Pretrial Services and provide verification to Pretrial Services or the supervising
6 officer.

7 The Court finds these conditions will reasonably ensure the appearance of the defendant
8 in future court proceedings, as well as reasonably ensure the safety of the community.

9 DATED 2nd day of August, 2021.



THE HONORABLE ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE